

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

Flava Works, Inc.,)	
)	
Plaintiff,)	Case No. 1:12-cv-07869
)	
John Doe Nos. 1 to 293; et.al,)	
)	
Defendants.)	

PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

NOW COMES Plaintiff, Flava Works, Inc. ("Flava Works"), by and through its attorney Shambee Law Office, Ltd. and hereby moves for entry of a default judgment, damages, attorneys' fees and costs, and issuance of a permanent injunction against Defendant William Johnson ("Defendant" or "Johnson"), pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, and states as following:

1. Plaintiff filed a Complaint against Defendants on or about October 1, 2012, claiming copyright infringement seeking damages and injunctive relief.
2. Having not known the identities of the defendants, Plaintiff filed this case naming Defendants as John Does through each individual internet protocol ("IP") address.
3. Plaintiff subpoena Comcast, the Internet Service Provider ("ISP") for some of the John Does identified by their IP addresses on or about February 1, 2013.
4. On or about January 21, 2015, this court entered an Order compelling the ISP to deliver the identification of the John Does with Illinois IP addresses.
5. Once receiving that identification of several John Does, Plaintiff served the identified John Does, including but not limited to William Johnson ("Johnson").
6. After hearing no response from Johnson, Plaintiff amended its Complaint, converting

several John Does, including Johnson, into named parties on October 6, 2014.

7. Plaintiff filed the Affidavit of Process Service for William Johnson, who was served on December 12, 2014. See Attached Exhibit A.

8. Plaintiff has tried to settle this matter with Johnson, to no avail.

9. More than 30 days have elapsed since Johnson was served with the Complaint and he has not filed his appearance or otherwise plead.

10. Defendant's failure to defend and deny the allegations of Plaintiff's complaint results in those allegations being admitted and Plaintiff therefore moves the Court for an entry of Default Judgment as to Johnson.

11. Plaintiff's requests that the Court schedule a hearing on the issues of damages and injunctive relief.

WHEREFORE, the Plaintiff, Flava Works, Inc., respectfully requests that this Court enter an Order of Default Judgment against Defendant William Johnson, for the claims of copyright infringement. Furthermore, Plaintiff respectfully requests that this Court schedule a hearing on the issues of damages and injunctive relief.

DATED: May 12, 2015

Respectfully Submitted,

By: s/ Juneitha Shambee
Juneitha Shambee
P.O. Box 91
Evanston, Illinois 60204
(773) 741-3602
shambeelaw@gmail.com
ARDC#: 6308145